

IV. Comments and Responses

During the public comment period, the Bureau of Air Quality received comments from several citizens in Allendale County. Comments made during the public hearing held on November 13, 2008 were all recorded. A transcript of the hearing, as well as all written comments received, will be kept on file. A summary of the comments received and the Bureau's response to those comments is found below.

1. **Noise** – Comments were received during the hearing regarding noise created by the facility. DHEC does not have the authority to regulate or monitor noise. Therefore, DHEC does not have the regulatory authority to consider noise when making permitting decisions. Grant Allendale stated that a land berm planted with trees was created along the property line parallel with US Highway 321 in an effort to provide a visual and noise buffer. Grant Allendale further provided that as the trees grow to maturity, they will provide greater noise reduction effects. Any continuing noise concerns should be directed to Steve Pohl (803-632-5915) at Grant Allendale.
2. **Property Values** - A comment was received regarding the impact that the facility has on neighboring property values. The Department does not have the regulatory authority to consider current or future property values when making permitting decisions. Permitting decisions are made based on compliance with the state and federal air regulations.
3. **Health Concerns** – Concerns were voiced during the hearing regarding issues with burning eyes and one citizen commented on rashes as a result of fumes from chemicals used at the facility.
 - a. *Compliance Demonstrations with Environmental Regulations* - In order to receive an air quality permit, the facility must demonstrate that they are in compliance with air quality standards set by the Environmental Protection Agency (EPA) and DHEC. The Clean Air Act, which was last amended in 1990, requires the EPA to set National Ambient Air Quality Standards (40 CFR part 50) for pollutants considered harmful to public health and the environment. The Clean Air Act established two types of national ambient air quality standards. Primary standards set limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings. The EPA Office of Air Quality Planning and Standards (OAQPS) has set National Ambient Air Quality Standards (NAAQS) for six principal pollutants, which are called "criteria" pollutants: particulate matter, nitrogen dioxide, sulfur dioxide, ozone, carbon

monoxide and lead. Grant Allendale has demonstrated through air dispersion computer modeling that it can meet these standards.

The EPA has not set national ambient standards for air toxics. However, South Carolina has set maximum allowable concentrations for air toxics emissions under SC Regulation 61-62.5, Standard 8 - Toxic Air Pollutants. These standards are protective of human health. The facility demonstrated compliance with these maximum allowable concentrations using an air dispersion computer model. These computer models, which are approved by the EPA, use the facility's controlled emission rates, production levels, property lines, and real weather conditions to predict the concentration of pollutants and how the pollutants move through the air. The highest concentrations of pollutants are compared to the state maximum allowable concentrations. In order to receive an air permit, the facility's highest modeled concentrations at the property line and beyond must be at or below the standards. Grant Allendale has demonstrated that it can meet these standards through air dispersion computer modeling. The table below represents the results of the air dispersion modeling analysis. For example, the maximum allowable concentration for arsenic is 1.00 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The maximum predicted concentration of hydrochloric acid at the Grant Allendale facility is predicted to be 0.00022 ($\mu\text{g}/\text{m}^3$), which is 0.02% of the standard.

Toxic Air Pollutant (TAP)	Standard 8 Maximum Allowable Concentration (MAC) in Micrograms per Cubic Meter ($\mu\text{g}/\text{m}^3$)	Grant Allendale Maximum Predicted Concentration (MPC) ($\mu\text{g}/\text{m}^3$)	% of Standard (MPC/MAC)
Arsenic	1.00	0.00022	0.02 %
Benzene	150.00	0.05129	0.03 %
Beryllium	0.01	0.00001	0.10 %
Cadmium	0.25	0.00004	0.02 %
Cobalt	0.25	0.00007	0.03 %
Cumene	9.00	0.07527	0.84 %
Hydrochloric Acid	175.00	0.19113	0.11 %
Manganese	25.00	0.01609	0.06 %
Methylene Biphenyl Isocyanate (MDI)	2.00	0.13821	6.91 %
Mercury	0.25	0.00004	0.02 %
Nickel	0.50	0.00033	0.07 %
4-Nitrophenol	<0.005	<0.000005	0.10 %
Phosphorus	0.50	0.00027	0.05 %
2,3,7,8-Tetrachlorodibenzo-p-d	<0.005	<0.000005	0.10 %

The processes at the Grant Allendale facility are subject to Maximum Achievable Control Technology (MACT) Standard (40 CFR 63) Subpart DDDD - National Emission Standards For Hazardous Air Pollutants: Plywood And Composite Wood Products. MACT standards are developed by the EPA as required by the Clean Air Act. The purpose of the MACT standards are to protect health and the environment by reducing hazardous air pollutants (HAPs) at major sources through control technology. Major sources are those that emit more than 10 tons per year of a single HAP and/or 25 tons per year of total HAPs. Subpart DDDD requires the facility to reduce volatile organic compounds (VOC), formaldehyde, or methanol emissions from the dryers and the press by 90%. The facility is required to verify the emissions reduction through source testing. In addition, Subpart DDDD requires the facility to monitor the temperature of the regenerative thermal oxidizer (RTO) control devices to ensure that they are functioning properly. The permit requires the facility to reduce VOC emissions through the RTOs by 95%.

b. Environmental Releases at the Facility – Since the beginning of operation, Grant Allendale has had the following incidents at the facility:

- 1) Grant Allendale reported a hydraulic oil leak in March 2007. An estimated 150 gallons of hydraulic fluid leaked from a broken pipe onto an asphalt surface. The oil was absorbed by dry wood fines and disposed of in the furnace. The leak and cleanup were reported to DHEC.
- 2) In September 2007, approximately 6,000 gallons of ammonia hydroxide were accidentally siphoned from the holding tank into the secondary containment areas. DHEC regional staff was notified, as was the National Response Center and Allendale EMS.
- 3) Four times during 2007, DHEC was notified by Grant Allendale of fires occurring in the dry strand storage area (3x) and dryer cyclone (1x) of the mill.

Grant Allendale followed the proper regulatory requirements for notification for each event.

c. Recurrence of Symptoms – Any time that adverse health affects, such as burning eyes and rashes, occur please contact the following:

- 1) DHEC Region 5 Aiken EQC Office – The staff at the regional office will assist you with any concerns or complaints that you have regarding the facility.

DHEC Region 5 Aiken EQC Office
206 Beaufort Street, NE
Aiken, SC 29801
(803) 641-7670

- 2) Your Physician - Any adverse health affects that are experienced should be evaluated, documented, and treated by your physician.
 - 3) Grant Allendale – The facility encourages the public to contact them directly with any concerns. The facility environmental contact, Steve Pohl, may be contacted at (803) 632-5915, or you may call the main switchboard number at (803) 632-5900.
4. **Supporters** - DHEC received verbal comments and written comments supporting the issuance of a permit for this facility. Title 48 of the SC Code of Laws, Section 48-1-100, states that “If, after appropriate public comment procedures, as defined by Department regulations, the Department finds that the discharge from the proposed outlet or source will not be in contravention of provisions of this chapter, a permit to construct and a permit to discharge must be issued to the applicant.” The Department cannot make permitting decisions based on community approval or disapproval of the company/facility.